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Before the
Federal Communications Commission
Washington, DC

DEC 31 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Amendment of Section 73.202(b),)	Docket No. 01-111
Table of Allotments,)	RM-10124
FM Broadcast Stations)	
(Alamo, Georgia))	
)	
Tel-Dodge Broadcasting Co.)	File No. BMP-20010522AAD
Application for Minor Change)	RM-10341
Station WMCG(FM))	
Milan, GA)	
To: Chief, Allocations Branch		

REPLY COMMENTS

Radio East Corp., by its attorney, submits its reply comments with respect to this proceeding.

With respect thereto, the following is stated:

The Petition for Rule Making filed by Radio East Corp. was filed on March 7, 2001. The application of Tel-Dodge Broadcasting Co. for minor change of Station WMCG(FM), Milan, Georgia, was subsequently filed on May 22, 2001. Therefore, in accordance with the provisions set forth in *Amendment of the Commission's Rules to Permit FM Channel and Class Modifications by Application*, 8 FCC Rcd 4735 n.22 (1993), the Tel-Dodge application has been accepted as a counterproposal and placed on Public Notice. *Public Notice*, Report No. 2520 (Dec. 14, 2001). No other counterproposals or comments were filed in this proceeding.

As with all rulemaking proceedings, this proceeding is governed by the allotment criteria which was set forth initially in Revision of *FM Assignment Policies and Procedures*, 90 F.C.C.2d 88 (1982) ("*Assignment Policies and Procedures*"), that establishes the following allotment priorities:

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- (1) first full-time aural service
- (2) second full-time aural service
- (3) first local service
- (4) other public interest matters

Co-equal weight is given to factors (2) and (3). Under these criteria, Radio East prevails.

Alamo, Georgia is an established community,¹ that has no other aural broadcast services. Therefore, Radio East's proposal falls under Priority (3). In contrast, Tel-Dodge's proposal only is an improvement of existing service. Consequently, it is entitled to consideration only under "Priority (4)." The Commission has stated that generally the provision of a new primary service is of greater public interest benefit than the expansion of an existing one, especially here, where Alamo is the more populous community (1,943 vs. 1,012).² See, e.g., *Chehalis, WA*, 13 FCC Rcd 13202, ¶ 6 (Chief, Allocations Branch 1998) (new allotment vs. one-step upgrade; new allotment prevails).

¹ See Petition for Rule Making, Attachment 2.

² Attachment 1, hereto.

Consequently, as between the two proposals, the proposal for modification of the FM Table of Allotments to add Channel 287C3 at Alamo, Georgia, is favored. It therefore respectfully is requested that the rulemaking proposal of Radio East Corp. be granted, and that the application of Tel-Dodge Broadcasting Co. be denied.

Respectfully submitted,

RADIO EAST CORP.

By: 

Dan J. Alpert

Its Attorney

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December 31, 2001

ATTACHMENT 1

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Quick Tables

DP-1. Profile of General Demographic Characteristics: 2000
 Data Set: Census 2000 Summary File 1 (SF 1) 100-Percent Data
 Geographic Area: **Milan town, Georgia**

NOTE: For information on confidentiality protection, nonsampling error, and definitions, see
<http://factfinder.census.gov/home/en/datanotes/expsf1u.htm>.

Subject	Number	Percent
Total population	1,012	100.0
SEX AND AGE		
Male	615	60.8
Female	397	39.2
Under 5 years	62	6.1
5 to 9 years	39	3.9
10 to 14 years	44	4.3
15 to 19 years	77	7.6
20 to 24 years	113	11.2
25 to 34 years	147	14.5
35 to 44 years	178	17.6
45 to 54 years	125	12.4
55 to 59 years	53	5.2
60 to 64 years	41	4.1
65 to 74 years	73	7.2
75 to 84 years	49	4.8
85 years and over	11	1.1
Median age (years)	36.4	(X)
18 years and over	828	81.8
Male	517	51.1
Female	311	30.7
21 years and over	769	76.0
62 years and over	159	15.7
65 years and over	133	13.1
Male	53	5.2
Female	80	7.9
RACE		
One race	1,008	99.6
White	655	64.7
Black or African American	353	34.9
American Indian and Alaska Native	0	0.0
Asian	0	0.0
Asian Indian	0	0.0
Chinese	0	0.0
Filipino	0	0.0
Japanese	0	0.0
Korean	0	0.0
Vietnamese	0	0.0
Other Asian ¹	0	0.0
Native Hawaiian and Other Pacific Islander	0	0.0
Native Hawaiian	0	0.0
Guamanian or Chamorro	0	0.0
Samoan	0	0.0
Other Pacific Islander ²	0	0.0

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DP-1. Profile of General Demographic Characteristics: 2000
 Data Set: Census 2000 Summary File 1 (SF 1) 100-Percent Data
 Geographic Area: **Alamo city, Georgia**

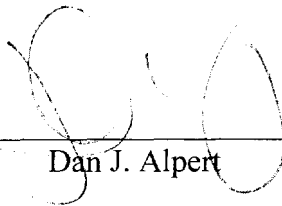
NOTE: For information on confidentiality protection, nonsampling error, and definitions, see
<http://factfinder.census.gov/home/en/datanotes/expsf1u.htm>.

Subject	Number	Percent
Total population	1,943	100.0
SEX AND AGE		
Male	1,400	72.1
Female	543	27.9
Under 5 years	71	3.7
5 to 9 years	79	4.1
10 to 14 years	86	4.4
15 to 19 years	91	4.7
20 to 24 years	224	11.5
25 to 34 years	441	22.7
35 to 44 years	432	22.2
45 to 54 years	278	14.3
55 to 59 years	69	3.6
60 to 64 years	29	1.5
65 to 74 years	69	3.6
75 to 84 years	51	2.6
85 years and over	23	1.2
Median age (years)	34.6	(X)
18 years and over	1,666	85.7
Male	1,273	65.5
Female	393	20.2
21 years and over	1,569	80.8
62 years and over	157	8.1
65 years and over	143	7.4
Male	45	2.3
Female	98	5.0
RACE		
One race	1,934	99.5
White	901	46.4
Black or African American	1,022	52.6
American Indian and Alaska Native	0	0.0
Asian	0	0.0
Asian Indian	0	0.0
Chinese	0	0.0
Filipino	0	0.0
Japanese	0	0.0
Korean	0	0.0
Vietnamese	0	0.0
Other Asian ¹	0	0.0
Native Hawaiian and Other Pacific Islander	0	0.0
Native Hawaiian	0	0.0
Guamanian or Chamorro	0	0.0
Samoan	0	0.0
Other Pacific Islander ²	0	0.0

CERTIFICATE OF SERVICE

I, Dan J. Alpert, hereby certify that the foregoing Reply Comments were served upon the following parties by First Class Mail:

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Dan J. Alpert